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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ELLIOTT GILLESPIE AND  
ROCKWOOD SPIRITS  
INTERNATIONAL,

Plaintiffs,

v.

PRESTIGE ROYAL LIQUORS,  
CORP., GABRIEL SEZANAYEV a/k/a  
Gavriyel Sezanayev, et al.  
Defendants.

Case No. 3:16-cv-02392-JSC  
*Hon. Haywood S. Gilliam, Jr.*

DECLARATION OF CATHERINE F.  
HOFFMAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT PRESITGE ROYAL  
LIQUORS AND GABRIEL  
SEZANAYEV'S RULE 12(b)2 AND  
(3) MOTIONS TO DISMISS FOR  
LACK OF PERSONAL  
JURISDICTION AND IMPROPER  
VENUE

**DECLARATION OF CATHERINE F. HOFFMAN**

I, Catherine F. Hoffman, declare as follows:

1. I am over the age of eighteen and have first-hand knowledge of the facts stated herein. I am admitted to practice in the State of Florida, the United States Supreme Court, and the U.S. District Courts for the Northern, Southern and Middle Districts of Florida.

2. I am admitted pro hac vice to this Court in connection with the above captioned case. I make this declaration on personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Facebook page for the 3 Kilos Vodka which is associated with www.3kilos.com. On the entry for July 26, 2016 of Exhibit 1, page 1, there is an entry reflecting the winner of the contest for the 3 Kilos Vodka who was a consumer from California. The California consumer was receiving the 3 Kilos Vodka bottle. Page 19 of this Exhibit shows that Defendants are launching nationwide and directed a California consumer to purchase the 3 Kilos Vodka directly from LWWarehouse.com, a NY Liquor store. Page 26 shows that Defendants have consumers on the West Coast who are promoting the 3 Kilos Vodka bottle.

4. Attached hereto as Exhibit 2 is a true and correct copy of a page from the 3 Kilos Vodka Instagram site where a consumer from California was told that a shipment of the product was coming in soon and that the product would be sent directly to the consumer in California.

5. Attached hereto as Exhibit 3 is a true and correct copy of a page from the 3 Kilos Vodka Instagram site where a consumer from "OC/Hollywood/San Diego/Vegas" was told that a shipment of the product was coming inquiring about the product. "OC" is known to be Orange County, California.

1           6.     Attached hereto as Exhibit 4 is a true and correct copy of a page  
2 from the 3 Kilos Vodka Instagram site where a consumer from California is  
3 pictured as a “satisfied customer.”

4           7.     Attached hereto as Exhibit 5 is a true and correct copy of pages from  
5 Remedy Liquor’s Facebook and website page advertising and offering for sale  
6 the 3 Kilos Vodka. Remedy Liquor is located in Glendale, California.

7           8.     Attached hereto as Exhibit 6 is a true and correct copy of pages from  
8 Mission Wine and Spirits website page advertising and offering for sale the 3  
9 Kilos Vodka. Mission Wine and Spirits has at least four locations in California  
10 as shown on the last page of the Exhibit listing where to buy the product.

11          9.     Attached hereto as Exhibit 7 is a true and correct copy of pages from  
12 High Time Wine Store website page advertising and offering for sale the 3 Kilos  
13 Vodka. High Time Wine has a store in California and is advertising and selling  
14 the product.

15          10.    Attached hereto as Exhibit 8 is a true and correct copy of pages from  
16 the website of Liquor and Wine Warehouse located in New York which is  
17 advertising and advertising and offering for sale the 3 Kilos Vodka and shipping  
18 to area codes in Northern California. The 3 Kilos Vodka Facebook page  
19 advertises Liquor and Wine Warehouse as the place to purchase the product  
20 online and at the store. See page 19, 28, 31 of Exhibit 1. Page 19 of Exhibit 1  
21 shows that a California consumer was specifically directed to the  
22 LWWarehouse.com website for Liquor and Wine Warehouse to purchase the 3  
23 Kilos Vodka online.

24          11.    Attached hereto as Exhibit 9 is a true and correct copy of pages from  
25 the Facebook account of Defendant Gabriel Sezanayev’s showing advertisement  
26 and promotion of the 3 Kilos Vodka and links to the 3 Kilos Vodka Facebook  
27 page.  
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